



**Shaping a new
tomorrow, today.**

December 20, 2022

United States Bureau of Reclamation
2007 Interim Guidelines SEIS Project Manager
Upper Colorado Basin Region,
125 South State Street, Suite 8100
Salt Lake City, Utah 84138

Via email to CRinterimops@usbr.gov

Re: Request for Comment on Supplemental Environmental Impact Statement for Near-term Colorado River Operations - 87 FR 69042.

Additional shortage reductions in the Lower Basin are necessary to forestall the decline of Lake Mead's storage volume due to the worsening conditions along the Colorado River. The Town of Gilbert appreciates the opportunity to respond to the U.S. Bureau of Reclamation's request for comments in the Notice of Intent to Prepare a Supplemental Environmental Impact Statement (SEIS) for the 2007 Colorado River Interim Guidelines as published in Federal Register Notice 87 FR 69042.

Gilbert holds multiple subcontracts and leases for Colorado River water delivery through the Central Arizona Project (CAP) system. The Colorado River is a critical water supply for the community making up approximately 50% of our annual water deliveries. We concur with the statement in the Notice of Intent that the unprecedented risk facing the Colorado River Basin necessitates additional actions from the federal government.

Reclamation's development of the SEIS and consideration of a Reservoir Operations Modification Alternative is critical now more than ever given the threat of continued dry hydrology. We support Reclamation to deliberate all the pathways forward by taking decisive action needed to stabilize the Colorado River system. In conjunction with nine other municipalities that encompass the Phoenix Active Management Area, we are acutely invested in the management of the Colorado River. We ask that when reviewing our input, Reclamation and the Department of the Interior keep in mind the importance of urban water users in the Colorado River Basin. To that end, Gilbert asks for Reclamation's considerations for following comments.

1. Water users throughout the Basin and Mexico should all share in the responsibility of taking shortage reductions and making efforts to protect the system. Equitable demand reductions are necessary to stabilize the Colorado River system. Gilbert implores Reclamation to spread additional reductions equitably across California, Nevada, and Arizona. Specifically, in a Tier 3 Shortage condition, Arizona Priority 4 (P4) water users will forego 720,000 acre-feet (AF) which far exceeds the set reductions for California or Nevada. In determining the basis for additional

reductions, Reclamation should consider utilizing the relative volumes and/or proportions of evaporation and system losses attributable to deliveries within each State.

2. We understand that reduced releases from Glen Canyon Dam may be necessary to protect the reservoir's infrastructure and stabilize Lake Powell should dry hydrologic conditions and low inflow scenarios continue. However, reducing releases from Glen Canyon Dam with no consideration for Lake Mead's elevation will quickly drive Mead to less than 900 feet in a matter of years. Gilbert supports a 1,000-foot elevation protection level at Lake Mead to avert deadpool. This protection level can be achieved by a combination of Lower Basin shortage reductions and balancing releases from Glen Canyon Dam. Additionally, Gilbert does not support any continuation of "operational neutrality" when implementing reduced releases from Glen Canyon Dam pursuant to this SEIS or future Upper Basin Drought Operations Response Agreement (DROA) actions. The system should be managed for increased reliability (instead of maximizing diversions and releases), to provide more stability for water users reliant on Colorado River supplies.
3. The uncertainty of mid-year adjustments is challenging for us to provide reliability to our customers. The uncertainty regarding the future of Colorado River supply availability makes it difficult to plan for and invest in the necessary infrastructure, alternative supplies, and conservation programs to overcome reductions. Clearly defined triggers based on reservoir conservative hydrology forecasts (i.e., not the Most Probable projection) is a strategy to mitigate the impact of mid-year adjustments. Having advanced notice to water users at the start of the water year to avoid an unplanned, mid-year release reduction will help provide as much advanced notice to water users as possible.
4. When integrating public health and safety into Colorado River operational decision-making, it is critical to understand that public health and safety cannot be reduced to an arbitrary allotment for minimum drinking water needs. As the main water provider, Gilbert must ensure that daily functions continue for the approximate 275,000 end users that include schools, hospitals, businesses, high-tech industries, residential homes, manufacturers, and more.

To consider unique elements of different communities, public health and safety determinations for water should be made on region-by-region basis. Water is critical to sustain our desert-adapted trees and urban ecosystems that provide natural cooling benefits and mitigate the urban heat island. Gilbert, just like the Colorado River system, are embroiled with extreme heat climates that can result in dire outcomes.

5. Gilbert supports Reclamation's intent to address methodologies for the assessment of evaporation, seepage, and other system losses as stated in the Federal Register



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Notice. Reclamation's methodology should factor in a water user's location and history of use when determining an entity's relative contribution to evaporation and system losses. All water users who draw upon the Colorado River enjoy the benefits of this water supply and simultaneously contribute to evaporation and system losses, regardless of priority. Therefore, it is reasonable and appropriate for all water users to share in the assessment of these losses.

6. The SEIS and Reclamation's proposed efforts are focused on the 2007 Interim Guidelines but a simultaneous assessment on water use reductions that examines the Upper Basin and continued DROA releases to Lake Powell should occur. The impacts of climate change, aridification, and over allocation are impacting water users throughout the Colorado River Basin and consequently all water users should share in the responsibility of taking action to protect the system.

To ensure our long-term ability to provide water to residents and businesses, and sustain our economy, we are committed to continued engagement with regards to the future of our Colorado River supplies. The SEIS will add flexibility to water management and facilitate more defined shortage mitigation strategies such as augmentation, exchanges, and conservation. The Town of Gilbert supports the development of the SEIS and is grateful for the opportunity to respond and engage with the U.S. Bureau of Reclamation throughout this process.

Sincerely,

A handwritten signature in cursive script that reads "Jessica L. Marlow".

Jessica Marlow
Public Works Director